

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SORIN PAUL MICLEA, Individually, and)
ANCA MICLEA a/k/a/ ANCA)
MOLDOVAN, Individually,)

Plaintiffs,)

v.)

Court No.: 08-cv-3456

CHASE BANKCARD SERVICES, INC., a)
corporation transaction business in Illinois;)
VISA U.S.A., INC., a corporation transaction)
business in Illinois; WYNDHAM CHICAGO,)
a corporation transaction business in Illinois,)

Defendants.)

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendants, Chase Bankcard Services, Inc. ("Chase"), and Visa U.S.A., Inc. ("Visa"), by their attorneys, Barnes & Thornburg LLP, and pursuant to Fed. R. Civ. P. 12, moves this Court for an extension of time for the Defendants to Answer or otherwise plead and, in support hereof, state as follows:

1. Plaintiffs filed a Complaint against Chase, Visa, and Wyndham Chicago ("Wyndham"), for claims involving various Federal statutes and breach of contract. The Complaint was served on Chase, Visa and Wyndham on June 26, 2008.

2. Attorneys for Chase and Visa filed their Appearance on July 16, 2008.

3. Pursuant to Fed. R. Civ. P. 12, Defendants have until July 16, 2008, in which to Answer or otherwise plead. Chase and Visa request an extension of time of 28 days, up to and including August 13, 2008, for all Defendants to file their Answers or otherwise plead. Chase and Visa request the additional time due to settlement discussions ongoing among the parties. Moreover, Visa and Chase have only recently retained counsel to defend them in this matter.

4. Based on the foregoing reasons, Chase and Visa request additional time, up to and including, August 13, 2008 for all Defendants to file their Answers or otherwise plead.

5. Plaintiff has agreed to allow Defendants an additional 28 days to Answer or otherwise plead to the Complaint.

WHEREFORE, Defendants, Chase Bankcard Services, Inc., and Visa U.S.A., Inc., request this Court enter an Order granting Defendants until August 13, 2008, to file their Answers or to otherwise plead and for such other relief as this Court deems just.

Respectfully submitted,

CHASE BANKCARD SERVICES, INC., and
VISA U.S.A., INC.

By: /s/ Charla L. Hausler
One of Their Attorneys

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